

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address M. Jonathan Hayes (Bar No. 90388) Matthew D. Resnik (Bar No. 182562) Roksana D. Moradi (Bar No. 266572) SIMON RESNIK HAYES LLP 15233 Ventura Blvd., Suite 250 Sherman Oaks, CA 91403 Telephone: (818) 783-6251 Facsimile: (818) 827-4919 jhayes@SRHLawFirm.com matthew@SRHLawFirm.com roksana@SRHLawFirm.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Erweee Group, Inc.	FOR COURT USE ONLY
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UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION	
In re: ERWEEE GROUP, INC., Debtor(s).	CASE NO.: 6:15-bk-12812-MH CHAPTER: 11 NOTICE OF SALE OF ESTATE PROPERTY

Sale Date: 02/23/2016	Time: 2:00 pm
Location: Courtroom 303, 3420 Twelfth Street, Riverside, CA 92501	

Type of Sale: ☒ Public ☐ Private **Last date to file objections:** 02/09/2016

Description of property to be sold:

Real Property commonly known as 969 Cypress Ave., Colton, CA 92324.

Terms and conditions of sale:

The Property will be sold "as is, where is," with no warranties or representations of any kind whatsoever.

Proposed sale price: \$ 199,000.00

Overbid procedure (if any): See attached recommended overbidding procedures.

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

February 23, 2016 at 2:00 p.m. in Courtroom 303, 3420 Twelfth Street, Riverside, CA 92501

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Roksana D. Moradi (Bar No. 266572)
SIMON RESNIK HAYES LLP
15233 Ventura Blvd., Suite 250
Sherman Oaks, CA 91403
Telephone: (818) 783-6251
Facsimile: (818) 827-4919
Roksana@SRHLawFirm.com

Date: 01/21/2016

Overbidding Procedures

Debtor proposes the following overbidding procedures:

- (1) The initial overbid must be at least \$5,000.00 more than the initial bid of \$199,000.00. The overbid must be on substantially the same terms as set forth in the purchase agreement attached as Exhibit “A” to the MOTION FOR ORDER APPROVING SALE OF REAL PROPERTY PURSUANT TO 11 U.S.C. §363 FREE AND CLEAR OF ALL LIENS, CLAIMS AND INTERESTS, AND GRANTING CERTAIN OTHER RELATED RELIEF (the “Sale Motion”).
- (2) Overbid increments will be \$1,000.00 after the initial overbid.
- (3) Any successful overbidder must be able to close by the Proposed Closing Date set forth in the Sale Motion, or upon this Court’s approval, whichever is later.
- (4) Any party wishing to overbid on the Subject Property during the hearing on the Motion must contact Debtor’s counsel at least forty-eight (48) hours prior to the hearing and provide evidence of available financial resources such as funds and/or proof of ability to finance to Debtor’s Counsel up to the overbidder’s maximum bid to the Debtor’s reasonable satisfaction.
- (5) Any overbidder wishing to overbid on the Subject Property during the hearing must also submit, before the time of the hearing, a deposit for the purchase of the Subject Property, by cashier’s check or other cash equivalent in the amount of at least \$15,000.00 made payable to “SIMON RESNIK HAYES LLP CLIENT TRUST ACCOUNT.” The successful overbidder’s deposit will be applied towards the purchase of the Subject Property, and will not be refunded in the event the overbidder cannot successfully close escrow pursuant to the terms of the sale as proscribed herein.
- (6) If a broker brings a prospective bidder who is ultimately the successful bidder and to whom the sale is approved, the broker will share in the commission with Debtor’s Broker (Debtor’s Broker will receive 3.5% and the other broker will receive 2.5%), on the terms set forth in the listing agreement attached as Exhibit “B” to the Sale Motion.

PROOF OF SERVICE OF DOCUMENT

11 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.
 2 My business address is: **SIMON RESNIK HAYES, LLP, 15233 Ventura Boulevard,
 Suite 250, Sherman Oaks, CA 91403.**

3 A true and correct copy of the foregoing document entitled **NOTICE OF SALE OF
 ESTATE PROPERTY; OVERBIDDING PROCEDURES** be served or was served (a)
 4 on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in
 5 the manner indicated below:

6 **I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**
 (“NEF”) Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) (“LBR”),
 7 the foregoing document will be served by the court via NEF and hyperlink to the
 document. On **1/21/2016** I checked the CM/ECF docket for this bankruptcy case or
 8 adversary proceeding and determined that the following person(s) are on the Electronic
 Mail Notice List to receive NEF transmission at the email address(es) indicated below:

- 9 • **Michael J Bujold** Michael.J.Bujold@usdoj.gov
- **Everett L Green** everett.l.green@usdoj.gov
- 10 • **M Jonathan Hayes** jhayes@srhlawfirm.com,
 roksana@srhlawfirm.com;matthew@srhlawfirm.com;rosarioz@srhlawfirm.co
 m;jfisher@srhlawfirm.com;maria@srhlawfirm.com;staci@srhlawfirm.com;jh
 11 ayeseef@gmail.com;sevan@srhlawfirm.com;carolyn@srhlawfirm.com
- 12 • **Amy E Martinez** amy.martinez@geracilawfirm.com,
 maria.castro@geracilawfirm.com
- 13 • **Martin W. Phillips** marty.phillips@att.net
- 14 • **United States Trustee (RS)** ustregion16.rs.ecf@usdoj.gov

15 **II. SERVED BY U.S. MAIL:** On **1/21/2016** I served the following person(s) and/or
 entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by
 16 placing a true and correct copy thereof in a sealed envelope in the United States Mail, first
 class, postage prepaid, and addressed as follows. Listing the judge here constitutes a
 17 declaration that mailing to the judge will be completed no later than 24 hours after the
 document is filed.

18 *Served via Certified Mail:*

19 San Bernardino County
 Dick Larsen, Treasurer Tax Collector
 20 172 West Third Street
 San Bernardino, CA 92415

21 *Served via regular mail as P.O. Boxes cannot be served via certified mail:*

22 [Per Proof of Claim; attorney is listed on ECF list.]

23 Pensco Trust Company
 24 c/o FCI Lender Services
 P O Box 27370
 25 Anaheim, CA 92809

26 *Served via U.S. Mail:*

27 Honorable Mark D. Houle
 United States Bankruptcy Court
 28 Central District of California

11 3420 Twelfth Street, Suite 365
Riverside, CA 92501-3819

2 ERWEE GROUP, INC.
211 RIVERSIDE DRIVE
3 RIALTO, CA 92376

4 *Debtor and buyer's agent:*

5 Jesus Naranjo
A&S Property Investments
6 8141 2nd Street
Downey, CA 90241

7 *Prospective buyer:*

8 Patricia Michel
9 7793 Sierra Ave.
Fontana, CA 92336

10 *Parties who have previously expressed an interest in the property:*

11 None

12 ALL REMAINING CREDITORS:

13 Del Toro Loan Servicing
14 Lantzman Investments Inc.
P.O. Box 211000
15 Chula Vista, CA 91921

Lisa M Castro
1128 N. Park Ave.
Rialto, CA 92376

16 Javier Rodriguez
1631 W Congress St
17 San Bernardino, CA 92410

Maria D Franco
211 S. Riverside Avenue
Rialto, CA 92376

18 Equity Funding Resources
P.O. Box 5793
19 Sherman Oaks, CA 91403

Mortgage Vintage, Inc.
260 Newport Center Dr., Ste. 403
Newport Beach, CA 92660

20 Enrique Saldivar
211 S. Riverside Ave.
21 Rialto, CA 92376

Rafaela Morales
211 S. Riverside Ave.
Rialto, CA 92376

22 Fernando Franco
2301 N Lugo Ave.
23 San Bernardino, CA 92404

Franchise Tax Board
Bankruptcy Section MS: A-340
PO Box 2952
Sacramento, CA 95812

24 Gonzalo Saldivar
7714 Palo Verde Avenue
25 Fontana, CA 92336

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101

26 Lantzman Investments, Inc.
c/o Marc Lantzman
27 11696 Sorrento Valley Blvd., #201
San Diego, CA 92121

Employment Development Dept.
Bankruptcy Group MIC 92E
Po Box 826880
Sacramento, CA 94280

U. S. Securities and Exchange
Commission
Attn: Bankruptcy Counsel
444 South Flower Street, Suite 900
Los Angeles, CA 90071-9591

Federal Building, Room 7516
300 North Los Angeles Street
Los Angeles, CA 90012

Attorney General
United States Department of Justice
Ben Franklin Station
P. O. Box 683
Washington, DC 20044

State Board of Equalization
Account Information Group, MIC: 29
P.O. Box 942879
Sacramento, CA 94279-0029

Spinnaker Loans
1042 N. Mountain Ave B456
Upland, CA 91786

Civil Process Clerk
United States Attorney's Office

RETURNED MAIL/REMOVED CREDITORS:

~~Western Pacific Development
and Construction Company
123 East 9th Street
Upland, CA 91786~~

**III. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE
TRANSMISSION OR EMAIL (indicate method for each person or entity served):**

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **1/21/2016** I served the following person(s) and/or entity(ies) by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

<u>1/21/2016</u>	<u>Ja'Nita Fisher</u>	<u>/s/ Ja'Nita Fisher</u>
<i>Date</i>	<i>Type Name</i>	<i>Signature</i>